



United States Attorney
Southern District of New York

The Jacob K. Javits Federal Building
26 Federal Plaza, 37th Floor
New York, New York 10278

July 8, 2024

BY ECF

The Honorable Colleen McMahon
United States District Judge
Southern District of New York
500 Pearl Street
New York, New York 10007

Re: United States v. Khaim Mavlyanov, 23 Cr. 415 (CM)

Dear Judge McMahon:

The parties respectfully write to request an approximately 30-day adjournment of the next status conference in the above-referenced matter, currently scheduled for July 11, 2024. The parties are actively engaged in discussions regarding a potential pretrial resolution of this matter and request the additional time to continue those discussions.

The Government also respectfully requests, with the consent of the defendant, that the time between today and the adjourned status conference be excluded pursuant to the provisions of the Speedy Trial Act, 18 U.S.C. § 3161(h)(7)(A). The Government submits that the ends of justice served by the granting of the proposed exclusion outweigh the best interests of the public and the defendant in a speedy trial, as the proposed exclusion will allow the parties to continue discussions regarding the possibility of pretrial resolution of this case.

Respectfully submitted,

DAMIAN WILLIAMS
United States Attorney for the
Southern District of New York

By: _____/s/
Jonathan L. Bodansky
Matthew R. Shahabian
Assistant United States Attorneys
(212) 637-2385 / -1046

cc: James Kousouros, Esq.

MEMO ENDORSED

7/9/24

Conference adj to
Sept 5, 2024
At 2pm - time
Excluded through
Sept 5, in the
interest of justice.

Colleen McMahon

USDC SDNY
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